

**Progress Report Documentation**

**For**

**Chattanooga Area**



## Chattanooga-Hamilton County Air Pollution Control Bureau

June 20, 2003

2003 JUN 24 PM 3:21

Barry Stephens, P. E.  
Technical Secretary  
Tennessee Air Pollution Board  
9<sup>th</sup> Floor, L & C Annex  
401 Church Street  
Nashville, TN 37243

Subject: Chattanooga Area EAC Progress Report

Dear Mr. Stephens:

The attached report provides the information required for the June 30 Progress report. We are providing the information required by the April 4 Memo from Lydia Wegman and by the Review Checklist for the June 30, 2003 Progress Report.

We appreciate your assistance in our work toward early attainment of new 8-hour ozone standard through our Early Action Compact.

Yours truly,

Robert H. Colby  
Director

## **CHATTANOOGA AREA EARLY ACTION COMPACT PROGRESS REPORT**

Early action compact participation was approved by the Meigs, Hamilton, and Marion County governments and by the City of Chattanooga in late December 2002. Catoosa and Walker Counties in Georgia and the Georgia Department of Environmental Protection agreed to support the compact at the same time.

The Chattanooga Urban Area Planning Organization and the Chattanooga-Hamilton County Air Pollution Control Bureau have been the primary organizations coordinating efforts to meet the requirements of the Early Action Compact. The Tennessee Department of Environment and Conservation, the Georgia Department of Environmental Protection, and the Georgia Department of Transportation have supported the Early Action Compact development. The lead contact is the Director of the Chattanooga-Hamilton County Air Pollution Control Bureau, Robert Colby.

The first requirement was to identify and describe the local control measures that will be considered during the local planning process. This list was developed and submitted to the Tennessee Department of Environment and Conservation and the Georgia Department of Environmental Protection on June 6. The state agencies submitted the list of controls being considered to EPA Region 4 by the June 16 deadline.

### *Outreach and Development of the Stakeholder Process*

In order to develop the list of controls and to develop community support for the Early Action Compact Process, the first efforts were directed to public education and awareness. An initial public meeting was held on March 25. Specific efforts were made to invite local environmental organizations. The Tennessee Department of Environment and Conservation explained the early action compact process to those who attended.

To further inform the public a Tennessee Ozone Early Action Compact Fact Sheet (Attachment 1) was prepared for the Chattanooga Region. This fact sheet was widely distributed to the public. Interested parties that were on mailing lists were mailed information concerning the Early Action Compact. Those on the Air Pollution Control Bureau mailing list, the Metropolitan Planning Organization mailing list, the Neighborhood Association mailing list and those who are members of the Chattanooga Air Toxics Study Stakeholders Advisory Group received the mailings. In addition, the Coosa Valley RDC in Georgia sent an Early Action Compact package to their stakeholders. Presentations were made at to the Downtown Chamber of Commerce and to the public at an Environmental Conference Sponsored by the University of Tennessee at Chattanooga from May 14-16.

Information is also available to the public on the Regional Planning Agency website at [www.chcrpa.org](http://www.chcrpa.org).

### *Selection of Possible Emission Reductions Measures*

Two public meetings to discuss controls were held in Chattanooga and in Georgia the Early Action compact received public input at a meeting of the North Georgia Citizens Advisory Committee meeting. The Chattanooga meetings were advertised in the *Chattanooga Times-Free Press*, *Chattanooga.com* a daily news publication produced in both electronic and printed versions, *The Walker County Messenger*, *The Catoosa County News*, *The Jasper Journal*, *the South Pittsburgh Hustler*, and *The Chattanooga Courier*, an African American paper. Attachment 2 shows the advertisement placed in the newspapers.

The Chattanooga meetings were held on May 19 and on June 2 with the assistance of a consultant who facilitated the entire process. Attachment 3 contains summaries of the two meetings. These meetings were well attended by citizens, environmental organization representatives, industry, and local and state government. At these meetings, a list of possible controls, from a report prepared by the University of Tennessee, was distributed and potential controls were discussed. Following deliberations, the interested stakeholders developed the list of controls contained in our June 16 submittal.

In addition to the stakeholders who attended the public meetings, county and city governments are stakeholders. Meetings were held with the County Executives of Marion County, Tennessee, Meigs County Tennessee, and with both the Mayor and the County Executive of Hamilton County, Tennessee. For Catoosa and Walker Counties in Georgia, meetings were held with the county executive's representatives.

### *Modeling/Technical Planning*

The necessary technical analysis to insure that adequate controls are adopted is in progress. There are three ozone monitors in the Early Action Compact Area. Two of the monitors are in Hamilton County Tennessee and the third is in Meigs County. The Meigs County monitor was not in place during the 1999 episode but it is located close to the Sequoyah monitor.

The ATMOS study provides the basis for this analysis. In the ATMOS study a 1999 ozone episode was modeled using the UAMV model. The emissions inventory was then grown to 2010. In 2010 the modeling indicates that the Early Action Compact area will be in attainment based on the estimated design values at the two monitors that were in place during the 1999 episode and on weight of evidence. Had the Meigs county monitor been in place it would very probably shown attainment also since it is located near the Sequoyah monitor. The observed values from the Meigs County Monitor have been close to the values observed at the Sequoyah monitor. For attainment in 2010 additional controls beyond the measures that are being adopted for the NO<sub>x</sub> SIP Call, Federal Measures, and the Georgia SIP are not needed.

The future year was then changed to 2007. The emissions inventory was adjusted appropriately and the model was run again. In 2007 the estimated design value at the Sequoyah Monitor is 82.97ppb and at the VAAP monitor is 85.10 ppb. Due to the close proximity of the Meigs County monitor to the Sequoyah monitor, the Sequoyah monitor estimated design value is expected to be close to the Meigs County monitor design value. A calculated 2007 estimated design value for the 9 cell grid around the Sequoyah monitor is 83.7. Though the modeling shows that the area will be in attainment with the standard or very close to attainment, some additional controls are needed in order to be able to demonstrate attainment by 2007. These controls will need to be in place by the 2005 ozone season. At the start of the 2003 Ozone Season all of the Georgia SIP reductions were in place. In May 2004 all NO<sub>x</sub> SIP call reductions will be in place. Mobile source emissions have started to decrease and will continue to decrease well beyond the attainment date.

An additional ozone episode will also be modeled. Funding has been approved. The selected episode time period is June 16-22 of 2001. The model will be the UAMV. The 1999 NEI will provide the basis of the point source emissions inventory but participants have been asked to provide corrections to the data. The modeling contractor is requesting 2001 VMT data from each state agency involved in the process. This includes Tennessee, Georgia and Alabama. The modeling contractor intends to run the first simulation of the June 2001 episode by the end of June of this year.

The list of control measures is being evaluated to estimate the reductions that can be expected from adoption of a particular control strategy. The control list contains options that probably could provide more reductions than would be needed. However this EAC area covers two states with different rules about what can be adopted at the county level and with different approaches at the state level. After the additional modeling and evaluation of the possible controls, the appropriate controls will be adopted to insure that the attainment demonstration starting in 2005 can be met. It is anticipated that the selected controls will be adopted throughout the EAC area but if it were to prove impossible to adopt a specific control measure in a particular jurisdiction, alternate controls may prove practical as long as the needed reductions are generated.

# **ATTACHMENT 1**

## **Fact Sheet**

# Tennessee Ozone Early Action Compact

## Chattanooga Region

Chattanooga- Hamilton County  
Air Pollution Control Bureau  
Chattanooga Urban Area  
Metropolitan Planning Organization

### FACT SHEET

Ozone (O<sub>3</sub>) is a colorless gas that is "good up high, bad nearby" says the Environmental Protection Agency (EPA). Ozone is caused by reactions in the atmosphere of motor vehicle exhaust; electric utility emissions; industrial boiler emissions; waste disposal; solvents; lawn equipment; garden equipment; open burning, and residential sources that burn fuel. It is a summertime problem.

Ozone harms our lungs, aggravates asthma and can cause permanent lung damage after long-term exposure. Ozone increases individual's vulnerability to illnesses such as pneumonia and bronchitis.

Ozone also harms our economy by reducing crop and forest yields. It can also affect tourism that is a vital part of the economy of the Chattanooga region. It restricts economic development by impeding efforts for attracting new business and industry to the region.

Due to excessive ozone levels, the Chattanooga region is threaten with the EPA designation of "nonattainment". Nonattainment means that the measured ozone levels in our region exceed the EPA standard set for air quality and is not always healthy to breathe. The Chattanooga region ozone levels are regularly monitored and have been found to exceed the new 8-hour standard of 80 parts per billion (ppb).

In order not be labeled as an EPA nonattainment area, the Tennessee Air Pollution Control Board signed a resolution in 2002 endorsing **Early Action Compacts** for Tennessee counties across the state that do meet the new 8-hour ozone standard. The label of nonattainment restricts industrial development and can create a public stigma that makes industrial recruitment, tourism and economic development much more difficult. If adequate progress is not made, nonattainment can cause loss of federal highway funds to state and local municipalities.

An **Early Action Compact (EAC)** is a broad commitment between government, business, industry and citizens to voluntarily improve air quality ahead of federal EPA requirements. The EAC implements local strategies for meeting the federal 8-hour ozone standard to provide cleaner air for the Chattanooga region.

By committing to the EAC, the Chattanooga region, like other regions across Tennessee, must gain local support and participation from all levels to attain the new ozone standard. Industrial controls alone are **not** enough. We all must contribute to the effort. Each of Tennessee EAC's are actively participating in selecting local control measures.

#### CHATTANOOGA REGION

Hamilton County  
Marion County

Meigs County

Active Participating  
Counties of

#### NORTH GEORGIA

Catoosa

Walker

#### COORDINATING AGENCIES

Chattanooga- Hamilton County  
Air Pollution Control Bureau

Chattanooga Urban Area  
Metropolitan Planning  
Organization

Tennessee Department of  
Environment and Conservation

Tennessee  
Department of Transportation

Georgia Environmental  
Protection Agency

Georgia  
Department of Transportation

U. S. Environmental  
Protection Agency

**The EAC agreement commits each area to specific deadlines listed below:**

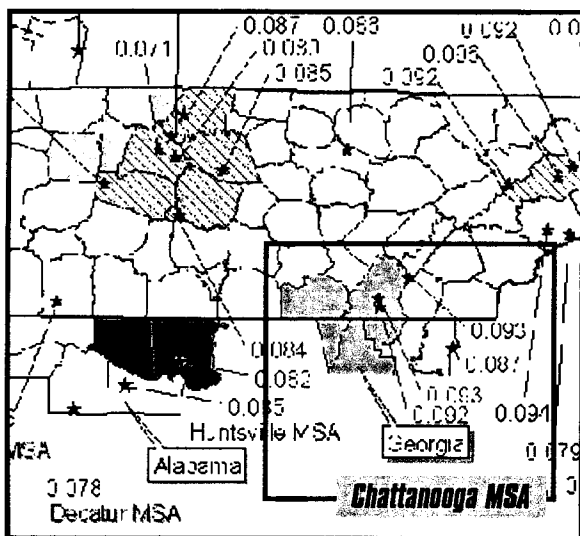
<b>June 16, 2003</b>	State sends EPA control measures being considered.
<b>June 30, 2003</b>	Submit Progress Report.
<b>March 2004</b>	Local areas submit air quality improvement plan to state.
<b>April 2004</b>	EPA designates nonattainment areas, but defers effective date for compact areas.
<b>December 2004</b>	State Air Pollution Control Board adopts control measures into State Improvement Plan.
<b>December 2004</b>	State submits State Improvement Plan to EPA.
<b>March 2005</b>	Implement emission reduction measures.
<b>2005-2007</b>	Measure ozone levels.
<b>October 2007</b>	

One of the benefits of early action is that it allows for broad public input and facilitates local planning and local decisions. The Chattanooga-Hamilton County Air Pollution Bureau and Chattanooga Urban Area Metropolitan Planning Organization (MPO) are seeking public input among key stakeholders throughout the entire Chattanooga region that includes the city of Chattanooga, Hamilton, Marion and Meigs counties in Tennessee and Catoosa and Walker counties in North Georgia.

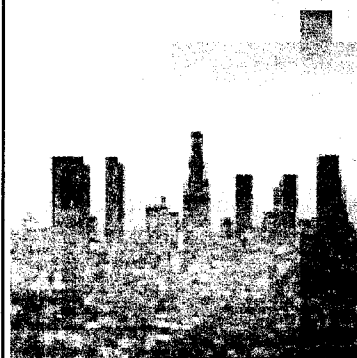
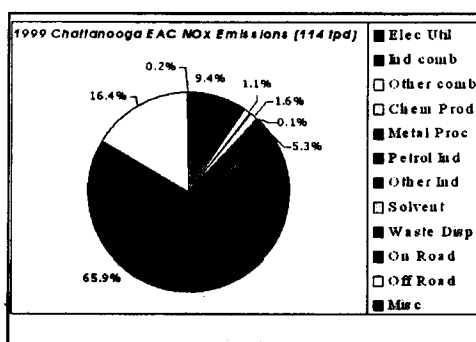
The APCB/MPO is conducting a series of public meetings with stakeholders to get input and to make the public aware of the air quality issue that is impacting our area.

Some of the things we can do on high ozone days is not burn brush, don't mow grass, don't use your ATV or boat. We can encourage the use of mass transit and other transportation alternatives by telecommuting if possible, carpooling if possible; use the bus, delay running errands. *We can all do our part to help!*

For further information about the EAC, public meetings and other presentation options for your group or association contact **Errol Reksten**, Air Pollution Control Bureau at [www.apcb.org](http://www.apcb.org) or by phone (423) 668-2570 or contact **Karen Rhodes**, MPO at [www.chcrpa.org](http://www.chcrpa.org) by phone (423) 757-5216.



**Chattanooga Region 8 Hour Ozone Design Value  
By MSA 2000-2002**



**Chattanooga - Hamilton  
Air Pollution Control Bureau**  
Robert H. Colby, Director  
Errol Reksten, Engineering Manager  
1250 Development Resource Center,  
Suite 300, Chattanooga, TN 37402  
(423) 668-2567



**Chattanooga Urban Area  
Metropolitan Planning  
Organization (MPO)**  
Barry Bennett, Executive Director  
Karen Rhodes, MPO Coordinator  
1250 Development Resource Center,  
Suite 200, Chattanooga, TN 37402  
(423) 757-5216



## **ATTACHMENT 2**

### **Newspaper Advertisement**



## **Tennessee Ozone Early Action Compact** *Chattanooga Region*

### **Public Information Session**

The Chattanooga-Hamilton County Air Pollution Control Bureau (APCB) and the Chattanooga Urban Area Metropolitan Planning Organization (MPO) will conduct a public information session to address the Early Action Compact for the Chattanooga region. The session will present possible air pollution control measures. Residents, environmentalists,

#### **INFORMATION SESSION #1**

Date: Monday, May 19, 2003  
Time: 5:00 p.m.  
Location: Development Resource Center  
1250 Market Street, First Floor

#### **INFORMATION SESSION #2**

Date: Monday, June 2, 2003  
Time: Approximately 6:00 p.m.  
Immediately following APCB  
regular meeting at 5:00 p.m.  
Location: Development Resource Center  
1250 Market Street, First Floor

business and industry officials of Hamilton, Marion, Meigs counties in Tennessee and active participating counties Walker and Catoosa in Georgia are encouraged to attend.

For more information, contact Robert H. Colby, Air Pollution Control Bureau Director at 423-668-2567. For ADA assistance contact Karen Rhodes, MPO Coordinator, 423-757-5216.

## **ATTACHMENT 3**

### **Meeting Summaries**

# **TENNESSEE OZONE EARLY ACTION COMPACT**

## **CHATTANOOGA REGION**

First Public Meeting

May 19, 2003

Development Resource Center, Chattanooga

**PRESENTER:**     **Bob Colby**, Director  
Chattanooga – Hamilton County  
Air Pollution Control Bureau

**FACILITATORS:**   **Karen Rhodes**, MPO Coordinator  
Chattanooga Urban Area Metropolitan Planning  
Organization (MPO)

**Errol Reksten**, Engineering Manager  
Chattanooga – Hamilton County  
Air Pollution Control Bureau

**Frances W. Hall**, Public Involvement Consultant  
Hall Communications, Inc.

**TOTAL NUMBER OF ATTENDEES: 17**

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Annette Eason

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Terry Johnson

# **TENNESSEE OZONE EARLY ACTION COMPACT**

## **CHATTANOOGA REGION**

First Public Meeting

*May 19, 2003*

**Development Resource Center, Chattanooga**

### **SUMMARIES OF TWO BREAKOUT DISCUSSIONS ON POSSIBLE LOCAL EPA CONTROL MEASURES**

Major employers should develop incentive programs for employees who use other alternatives for commuting to and from work than use of their personal vehicle. If the employer pays for parking, if the employee uses mass transit, that employee should have the parking fee added to their regular salary as a extra benefit.

Ozone Actions Days should emphasize carpooling, development of flexible work schedules that would allow employees to select a four day – ten hours per day work schedule.

Local government should raise the parking fee for coming into the downtown core to force regular commuters to use mass transit.

Lower speeds for the 18-wheelers coming through the heart of the city would help with emissions.

In Georgia, we ban open burning during the ozone season, which is mostly all summer long. We simply do not issue any open burning permits after April.

We need to commit money and personnel to educating the public about the problem. The public education campaign would most likely be led by the Air Pollution Control Bureau, supported by the Chattanooga Urban Area MPO.

We should recommend that homeowners use electric or solar powered lawnmowers. We would even go so far as to recommend the old-fashioned push mower. One(1) lawnmower creates the same amount of pollution as forty-eight (48) automobiles.

INFORMATION: We are able to forecast ozone based on the weather, temperature, wind, humidity and the previous days levels. Stationary high pressure system creates ideal conditions for the creation of ozone. All outdoor activities should be deferred to late afternoon on a high ozone day. It takes approximately four (4) hours for ozone to form.

Ozone Action Days should be announced by a morning fax to the media (TV, radio, newspapers)

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Ozone Actions Days should employ  
schedules that would allow employ-  
work schedule.

Local government should raise the  
core to force regular commuters to

Lower speeds for the 18-wheelers  
help with emissions.

In Georgia, we had open burn in  
summer long. We simply do not

We need to commit more  
problem. The public ex-  
Pollution Control Bu-

I would like to receive some details about the Tennessee Valley Authority and the role they play in the creation of ozone in our region and what they are doing about it.

We have a newly completed Bike and Greenway Plan. Our first step should be the implementation of that plan. We need to institutionalize the bike and pedestrian accommodations outlined in the plan.

I would like to know how much of the ozone is our and how much comes from other areas. Of our 93ppb, approximately 18 ppb comes from Georgia.

We have a Master Bike Plan/Greenway Plan @ UTC. There is a one-mile walkway at Lookout Mountain, GA. At Fort Oglethorpe- there is a currently a walkway/sidewalk project underway. Chattanooga is performing a sidewalk/streetscape study in process.

Industry can control the time of emissions, Couldn't they do it very early in the morning or very late in the evening. Yes, but there are really on two industries in the immediate Chattanooga area that has emissions. Our problem comes from surrounding areas and traffic.

We need to consider toll roads. Maybe toll roads are the best way to control the diesel trucks coming into the city.

We need to implement an inspection of maintenance of vehicles program.

We should consider a BY PASS.

Lower speed limits need to be legislated.

Open burning restrictions need to be developed specifically for ozone season.

Ozone Actions Days need to be used in our region.

Incentives for persons who drive hybrid vehicles should be adopted. Incentives like free on street parking, or some form of property tax rebate.

Develop bike/pedestrian facilities.

Public Education is a key.

Stage 1 Vapor Recovery

Extension of Bus Service into Marion County.



Lower sulfur fuel

Develop ITS

The public should be encouraged to look at GAS appliances.

Implement inspection programs

Long-term BY PASS for trucks or develop truck lanes to move them quickly through the region.

Tie Open Burning Permits to Ozone Action Days.

Hold as many outdoor activities such as mowing the lawn to the late afternoon, early evening hours.

#### **OTHER COMMENTS:**

- A strictly enforced 55 miles per hour speed limit for trucks and 65 miles per hour for cars speed limit would be effective.

# TENNESSEE OZONE EARLY ACTION COMPACT

## CHATTANOOGA REGION

### Second Public Meeting

June 2, 2003

*Development Resource Center, Chattanooga*

**FACILITATORS:** **Errol Reksten**, Engineering Manager  
Chattanooga Hamilton County Air Pollution Control Bureau

**Karen Rhodes**, MPO Coordinator  
Chattanooga Urban Area Metropolitan Planning  
Organization

**Frances W. Hall**, Public Involvement Manager  
Hall Communications, Inc.

## LIST OF ATTENDEES

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**Kelso Wyeth**  
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**David C. Higney**  
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TENNESSEE OZONE EARLY ACTION COMPACT  
CHATTANOOGA REGION  
June 2, 2003

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TENNESSEE OZONE EARLY ACTION COMPACT  
CHATTANOOGA REGION  
June 2, 2003

**MARION COUNTY**

Presented a written **Landfill Standard Procedures** for the record, which outlined prior actions taken which reduces ozone pollution.

**DISCUSSION GROUP**

*Errol Reksten, Facilitator*

The meeting opened with a discussion of the history of how the region moved toward the threat of non-attainment by the Environmental Protection Agency. It was pointed out that a label of non-attainment in the Chattanooga region would essentially shut down industrial development in the entire region. The EPA will make a designation by March 2004. The MSA boundary of the Chattanooga region is composed of Meigs, Hamilton, Marion, Dade, Walker and Catoosa counties in Tennessee and North Georgia. At this point, only Marion County is the most likely county to achieve attainment by the EPA deadline.

Working in the favor of the region is the number of ozone reductions Georgia currently has in place. TVA has reduced emissions at the Widows Creek Plant as well.

Our agency has submitted a grant request of \$100,000 for air pollution control devices for school buses.

We have only two large industrial sources of Nox in the region: Signal Mountain Cement and Dupont. I want to point out that only 5.9 tons of Nox comes from industry daily, while 33 tons per day comes from vehicles per day. We need 2 tons per day reduction each day during ozone season.

2007- EPA shows attainment at 85 ppb. Modeling conducted in the Chattanooga region indicates that the region can attain between 83.7 and 85.1 ppb. Weight of evidence can be used if you are under 90 ppb.

2005 – Short term reductions must be in place to reduce the emissions of cars and trucks. New technologies of the automobile and trucking industry will help achieve the ppb. goal.

June 16<sup>th</sup> report will outline the Preliminary Modeling Report, Stakeholder Input, and the List of Proposed Control Measures.

TENNESSEE OZONE EARLY ACTION COMPACT  
CHATTANOOGA REGION  
June 2, 2003

In the Georgia counties of Catoosa and Walker, there are no restrictions on outdoor burning. There are eight cities in Marion County and burning permits are issued by Department of Forestry. Discussions with representatives from Forestry are needed to bring them up to speed with the EAC.

## **RECOMMENDATIONS**

- Governmental agencies should be required to buy hybrid cars for their fleets.
- We need to meet with TDOT and GDOT and control the timing of construction better so that we don't have huge numbers of cars idling on the interstate during the peak ozone times during the day. During ozone season, road construction should be restricted to evening hours.
- TDOT and GDOT should delay major road construction projects during the time we are trying to achieve our EAC goal of 2007 so as not to damage our efforts of attainment and compliance with EPA.
- Re-schedule deliveries by semi-trucks to businesses downtown to the late afternoon/early evening to help with traffic congestion.
- We need to create an aggressive advertising campaign with radio and television to inform the general public about the ozone problem and what they can do as individual to help achieve the goal of attainment in 2007.
- I recommend that the APCB and the MPO set a meeting with industry officials and industrial boards as soon as possible to make them aware of the problem and the EAC. There are industrial companies like Tennessee Galvanized and U.S. Pipe who are already doing their part to help. The public and industry leaders need to know those folks who are voluntarily doing their part to help.
- We should look at providing tax incentives to companies who use low-sulfur diesel fuel in the vehicles like the Marion County Landfill. Companies like U.S. Xpress could really benefit by a tax incentive.
- Fire engines and other city and county fleets should use the low-sulfur diesel.
- Regarding the public education campaign, we need to develop an infomercial to run on public access television and to be featured on the evening news, possibly a coordinated joint simulcast of all stations to announce Ozone Actions Days kick off in the Chattanooga Region.